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(Reg)



**CRI RESOURCES, INC.**

August 26, 2002

900 Wilshire Blvd., Suite 1520  
Los Angeles, CA 90017-4716  
Telephone: (213) 624-8161  
(800) 421-6158  
Fax: (213) 624-7703  
CA Conf. License 021064

CERTIFIED MAIL-RRR

Ms. Carlyn Winter Prisk (3HS11)  
U. S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**RECEIVED**

AUG 30 2002

**PRP INV/INFO SECTION**

Re: Required Submission of Information  
Lower Darby Creek Area Superfund Site – Clearview Landfill, Folcroft Landfill,  
and Folcroft Landfill Annex

Dear Ms. Winter-Prisk:

The point is first, that the trade style of Cleveland Wrecking Company was sold, not the corporation, nor its assets and liabilities. As CRI Resources, Inc. we are the successor to Cleveland Wrecking Company that operated in the Philadelphia area.

We answered you previously that the site of operations in Sharon Hill, Pennsylvania was totally destroyed by fire in November 1985 and unfortunately records are not at our disposal. Also we answered you previously the only things we hauled and dumped are debris of building material resulting from demolition of buildings.

We have not used nor can we verify that we even dumped any material in the area you describe. To Mr. Fenning's recall, Clearview was not among the places we ever used. We cannot verify that we never dumped there but in all fairness could not dispute we might have at one time used it. We have no existing records of this kind of activity in the years you mention. We never dumped illegally. We were not in the business of hauling hazardous material. We never dumped hazardous material illegally.

The operation in Philadelphia has been closed completely since 1997. All of our old employees that might have knowledge or memory of the operation would be very difficult to locate. The facts of the fire are easily proven and the closure of our Philadelphia activity as Cleveland Wrecking Company is also a provable fact.

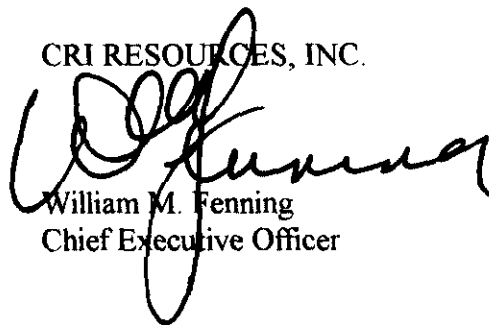
Ms. Carlyn Winter-Prisk  
U. S. EPA, Region III  
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August 26, 2002

The responses to Enclosure F are given as best as is possible given the passage of time and events since 1958. I will be happy to help you in any way I can. Please feel free to call (800) 421-6158 .

Very truly yours,

CRI RESOURCES, INC.



William M. Fenning  
Chief Executive Officer

WMF:na

Attachment: Enclosure F-Questions/Responses

RESPONSES BY CRI RESOURCES, INC.

Enclosure F – Questions

Page 4

d. Not applicable.

15. No.

16. None.

17.

a. These questions are answered by Mr. William M. Fenning, who has been the Chief Operating Officer of the corporation for 40 years. His business address and telephone number are as follows:

CRI Resources, Inc. 800) 421-6158 or (213) 624-8161 ext 22.  
900 Wilshire Blvd., Suite 1520  
Los Angeles, California 90017-4716

b. Future correspondence or telephone calls should be directed to Mr. Fenning as listed above.

19 Documents solicited in this information request are no longer available, for the following:

a. Our document retention policy schedules destruction of documents after periods of time varying from two to ten years. Some records are retained permanently.

b. In early years documents were destroyed by incineration. For some time the process has been by shredding. In compliance with federal and state requirements the time period for retention of certain types of records has been expanded.

In November 1985, the files at our Sharon Hill facility were for the greatest part burned or were damaged beyond reclamation by smoke and water when an early morning fire swept through the buildings and yard.

c. Job files, contracts, agreements, licenses, permits, receivable invoices, payable invoices, local and state tax filings, dump tickets, correspondence, logbooks,

d. George Gillespie, Office Manager, deceased 1979

CRI RESOURCES, INC.

By   
William M. Fenning, CEO

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Required Submission of Information

Lower Darby Creek Area Superfund Site – Clearview Landfill, Folcroft Landfill, and Folcroft Landfill Annex

Responses to Enclosure F – Questions

1. CRI Resources, Inc.  
900 Wilshire Blvd., Suite 1520  
Los Angeles, California 90017-4716  
(213) 624-8161

a.	State	Date Admitted	State	Date Admitted
	Alabama *	11/01/72	Missouri *	04/24/53
	Arkansas *	07/16/80	Montana	07/18/82
	Arizona	08/17/59	Nebraska *	01/26/82
	California *	01/17/33	Nevada	04/30/61
	Colorado		New Jersey *	12/12/38
	Connecticut		New Mexico *	06/11/57
	Delaware *	09/04/28	New York *	08/26/40
	Florida *	02/11/65	North Carolina *	08/10/59
	Georgia *	05/18/62	Ohio *	11/09/28
	Hawaii *	03/14/70	Oklahoma *	04/15/64
	Illinois *	10/19/34	Oregon *	07/12/54
	Indiana *	12/10/34	Pennsylvania *	08/27/35
	Iowa *	08/02/01	Rhode Island	04/12/95
	Kansas *	09/28/78	South Carolina *	01/14/69
	Kentucky *	06/28/40	Tennessee *	07/19/49
	Louisiana *	01/13/64	Texas *	01/28/71
	Maryland *	07/29/40	Utah	01/04/55
	Massachusetts *	05/28/71	Virginia	1955
	Michigan	08/17/61	Washington	08/23/65
	Minnesota *	08/10/34	West Virginia *	11/13/54
	Mississippi *	10/28/81	Wisconsin *	10/31/75

\* company is currently chartered

- b. The domicile state is Delaware. Date of incorporation is September 4, 1928.

RESPONSES BY CRI RESOURCES, INC.

Enclosure F – Questions

Page 2

c. CRI Resources, Inc. is the parent company of S R Wrecking, Inc., fka Sovereign Construction, Inc., a California corporation.

2 CRI Resources, Inc. currently does not conduct any business activity in the Philadelphia, Pennsylvania area. Between 1958 and 1976, CRI Resources, Inc, known then as Cleveland Wrecking Company maintained a branch office at 702 Chester Pike, Sharon Hill, Pennsylvania 19079 and was active in the demolition of structures of all kinds and the sale of salvage. The facility at Sharon Hill commenced shutting down in 1996 and was permanently closed in 1997.

3. The only person currently employed who may have personal knowledge of our operations and waste disposal practices between 1958 and 1976 at the facility in the Philadelphia, Pennsylvania area is

William M. Fenning, Chairman and CEO (213) 624-8161  
CRI Resources, Inc.  
900 Wilshire Blvd., Ste 1520  
Los Angeles, CA 90017-4716

Employed with this company since 1957, and as President and Chief Operating Officer since 1967, had no direct involvement with the day-to-day operations at the Sharon Hill Office.

4. To the best of my knowledge and belief, CRI Resources, Inc. did not generate, store, treat, transport or dispose of any hazardous substances, hazardous waste, pollutant, contaminant or other waste between 1958 and 1976. only ordinary debris such as wood, brick, concrete, etc., resulting from demolition activities.

a. I have no reason to believe that we may have dumped any hazardous or toxic material in the landfill areas you reference, and therefore cannot describe the types of documents maintained by our establishment in the Philadelphia, Pennsylvania area for any such activity. It would have been in line with our standard operating procedure at the time in question for a project manager to include documentation in the official job file. Due to the time span from the alleged occurrences to the date of this inquiry it is not possible to identify persons employed as project managers.

b. With the establishment of regulatory agencies regarding the transportation and disposal of such wastes you mention, it would have become a standard operating practice of our company to obtain any and all necessary permits and required certifications had the need occurred Any records or correspondence of such would have been routinely destroyed in accordance with the retention policy, or destroyed by the fire on the premises in November 1985.

RESPONSES BY CRI RESOURCES, INC.

Enclosure F – Questions

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c. There are no contracts or correspondence between our company and/or establishment(s) and any other company or entity regarding the transportation and disposal of any hazardous substances.

5. Any dump trucks owned by our company were not for hire by others.

6. Not applicable.

7. Not applicable.

8. Not applicable.

9. Documentation of dump loads of demolition debris from our job sites are no longer available. According to our retention policy, load books were kept for two years.

10. Dump trucks.

11. We had no control of the material after it was taken to a dumpsite. It would have been handled in accordance with the regulations at the time.

12. We are not able to identify or specify any individuals or entities that may have been observed at the site in question. We cannot say if we did or did not ever use the site.

13. We are unable to provide the names, titles, areas of responsibility, addresses, and telephone numbers of former employees between 1958 and 1976. We currently have no employees in the Philadelphia, Pennsylvania area.

a. Not available.

b. Not available.

c. Not available.

d. Not available.

14. To the best of my knowledge and belief no spills occurred.

a. Not applicable.

b. Not applicable.

c. Not applicable.

ORI RESOURCES, INC.  
900 WILSHIRE BLVD., #1520  
LOS ANGELES CA 90017-4716



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RETURN RECEIPT R

2007 08 07M

MS CARLYN WINTER PRISK (3HS11)  
U S ENVIRONMENTAL PROTECTION AGENCY REGION III  
1650 ARCH ST  
PHILADELPHIA PA 19103-2029

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

**CERTIFIED MAIL**



7001 2510 0003 2026 8535

**RETURN RECEIPT  
REQUESTED**